

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AGRISTAR FROZEN FOODS, INC.,  
a dissolved Illinois corporation,

Plaintiff,

v.

AMERICE, INC.,  
a Delaware corporation; PETER  
CRANSTON; ROBERT J. FANG;  
ROBERT D. GOLUB; and PERIMETER  
GROUP, INTERNATIONAL, INC.  
a Georgia corporation,

Defendants.

Case No. 05 C 6007

Judge Ruben Castillo

Magistrate Judge Ashman

**MOTION FOR ENTRY OF JUDGMENT  
ON A SEPARATE DOCUMENT PURSUANT TO FED. R. CIV. P. 58(d)**

Plaintiff AGRISTAR FROZEN FOODS, INC., by and through its attorneys, FREEBORN & PETERS, LLP, respectfully requests that this Honorable Court enter an Order directing that a judgment in favor of Plaintiff in the amount of \$21,000 be entered in a separate document in accordance with Fed. R. Civ. P. 58(d).

In support of its Motion, Plaintiff states as follows:

1. On September 6, 2006, this Court entered a minute order in the above-captioned case, awarding Plaintiff attorneys' fees in the amount of \$18,000, and costs in the amount of \$3,000. *See* September 6, 2006 Order of Court, attached hereto as *Exhibit A*.
2. The Court specifically found that Plaintiff was forced to incur these fees and costs due to Defendants' "dilatory actions." *Id.*

3. Unfortunately, despite numerous requests for payment directed to Defendants' counsel of record, Douglas Drenk, the Defendants have failed to pay the amounts awarded by the Court.

4. Plaintiff now requests that this finding be set forth in a separate document constituting a final and enforceable order of judgment, as provided for in Fed. R. Civ. P. 58(d), so that Plaintiff may domesticate the judgment in Georgia for purposes of enforcement.

WHEREFORE, Plaintiff respectfully requests that this Court enter a final and enforceable judgment against Defendants and in favor of Plaintiff in the amount of \$18,000 in attorneys' fees and \$3,000 in costs, as set forth in the proposed order attached hereto, and for any other relief that this Court may deem just and equitable.

Dated: February 6, 2007

Respectfully Submitted,

AGRISTAR FROZEN FOODS, INC.

By:     /s/ Neal H. Levin      
One of Its Attorneys

Neal H. Levin, Esq.  
Theodore J. Koerth, Esq.  
Rachel E.A. Atterberry, Esq.  
FREEBORN & PETERS LLP  
311 South Wacker Drive, Suite 3000  
Chicago, Illinois 60606-6677  
Telephone: (312) 360-6000

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